

U. S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
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AUG 16 2010

TONY R. MOORE, JR.
BY

DEPUTY

United States District Court
Western District of Louisiana
Lafayette - Opelousas Division

Marvin Mitchell Williamson Jr.

versus

10cv1319 Sec P

C.E. Bourg II - LSBN 3315

Petition For Damages

Now into court, Marvin Mitchell Williamson JR, pro-se litigant in proper person to move this Honorable Court herein after known as the plaintiff. The plaintiff a resident at The River Correctional Center, Ferriday, Louisiana 71334, Parish of Concordia. Respectfully shows that:

1.

Jurisdiction in under 28 U.S.C. 1332

Made Defendant herein are:

A) Charles E. Bourg II, a resident and Independent Attorney at Law of the lawful age of majority, in the Parish of St. Mary, business address at 1109 Eighth St. Morgan City, Louisiana 70380

2.

In Mid-February 2008 the plaintiff Marvin M. Williamson Jr retained the defendant C.E. Bourg II as counsel at his place of business for one dollar as a retainer fee in a civil action suit against The City of Morgan City and (2) officers' for a civil rights violation of the United States constitution. At a later date in the following months the defendant elected to represent the plaintiff in criminal proceedings in the 16th Judicial District Court, St. Mary Parish Louisiana. The plaintiff alleges on information and belief that the defendant misrepresented either by incompetence, neglect or other misconduct, leading to a Grave Miscarriage of Justice, loss of liberty, loss of property and great mental anguish. The defendant has withheld documents, evidence, and anything of concern to the plaintiffs interest concerning his rights thus adding considerable damaging burdens.

3.

During this whole time Marvin M. Williamson from February 2008 since retaining Mr. C.E. Bourg, Marvin M. Williamson has received critically incorrect representation.

4.

Marvin M. Williamson Jr the plaintiff is informed and believes the defendant has lied on numerous occasions in civil matters and Criminal proceeding thus depriving him of due process of law. In violation of the Constitution.

5.

The occurrence of events described above was caused by solely and proximately by the gross neglect and or misconduct, misrepresentation, Malpractice and reckless disregard for human rights. Particular, to wit:

- A) Ethical misconduct - lying;
- B) Filing frivolous documents;
- C) Falling below professional standards as an Attorney;
- D) Hampering or preventing a legitimate federal rights violation from being reported to a Judge either by omission or purposely;
- E) By not presenting any defense in a criminal court of law.
- F) By filing an untimely appeal in criminal proceeding that had reversible errors;
- G) By abandoning his client taking all documentation and leaving the plaintiff with nothing to protect his interest.
- H) Any and all other acts and omissions to be proven through discovery or at the trial of this matter, all of which were in contravention of the exercise of due care and procedure.

6.

As a result of combined fault, gross neglect, misrepresentation or misconduct of the defendant C.E. Bourg II the plaintiff Marvin M. Williamson Jr. suffered severe injuries including, but not limited to the following: Property:

- A) Liberty
- B) loss of Society
- C) Loss of Love
- D) Loss of Care
- E) Attention
- F) Companionship
- G) Comfort
- H) guidance and protection
- I) Loss wages - past, present and future
- J) Loss of a \$34,000.00 Harley Davidson
- K) Loss of (2) pick up trucks \$15,000.00 dollars
- L) Loss of tools in excess of \$15,000.00 dollars
- M) Loss of furniture and trailer

7.

As a result of the defendant(s) C.E. Bourg fault, gross neglect, misrepresentation, misconduct or malpractice the plaintiff Marvin M. Williamson Jr. suffered the following damages:

- A) Physical pain and Suffering - past, present and future
- B) Mental pain, anguish, and distress - past, present, future
- C) Medical expenses - past, present and future
- D) loss of enjoyment of life - past, present and future
- E) loss of wages
- F) Any and all other damages which shall be proven at a trial in this matter.

8.

The plaintiff Marvin M. Williamson Jr. herein is entitled to damages for the items set forth in such amounts as are reasonable in the premises

Wherefore Plaintiff Prays:

1. That a certified copies of this petition, together with citation, be issued and served according to law on the defendant.

A) Charles E. Bourg II - LSBN 3315
Attorney at law
1109 Eighth St.
Morgan City, Louisiana 70380
St. Mary Parish

- 2.) After the elapse of all legal delays and proceedings had, there be judgement against Charles E. Bourg II, Attorney at law.
- 3) For all necessary orders and decrees as may be required or proper for full, general and equitable relief; and
- 4) For legal interest from date of judicial demand on all amounts awarded, and for all costs of these proceedings.

Respectfully Submitted

Marvin M. Williamson JR.

Marvin M. Williamson JR. # 543885

River Correctional Center

26362 Hwy. 15

Ferriday, Louisiana 71334

Please Serve

Charles E. Bourg II - LSBN-3315
Attorney at law
1109 Eighth St.
Morgan City, Louisiana 70380
St. Mary Parish

Verification

State of Louisiana

Parish of Concordia

Before me the undersigned authority, personally came and appeared, Marvin M. Williamson, JR. who first being duly sworn, did depose and say:

That he is the petitioner and have read the foregoing petition and allegations contained herein are true and correct to the best of his knowledge, information and belief under penalty of perjury.

By Marvin M. Williamson, Jr.
Marvin M. Williamson

Sworn to and Subscribed
before me this 10th day of
August, 2010

Dana W. Mura

Notary Public

Signed on this 10th day of August, 2010
Concordia Parish, Louisiana

Marvin W. Williamson Jr.
#543885

River Correctional Center

27362 Hwy. 15

Friday, Louisiana 71334

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TONY H. MOORE, CLERK
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA

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NOT CENSORED

Clerk, United States District Court
Western District of Louisiana
U.S. Courthouse
300 Fannin St. Suite 1167
Shreveport, Louisiana 71101-3083